

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor C. Stephen Allred, Director

December 15, 2000

CERTIFIED MAIL #7099 3220 0006 2682 0897

Sharon Deeds, Coordinator Western World, Inc. Circle J Trailers 200 N. Kit Avenue Caldwell, ID 83605

RE: 97010164-1, Western World, Inc., Circle J Trailers, Caldwell

(Final Tier I Operating Permit No. 027-00064)

Dear Ms. Deeds:

The Idaho Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit Number 027-00064 for Western World, Inc., Circle J Trailers, in accordance with Title V of the Clean Air Act and IDAPA 58.01.01.300 through 386 (*Rules for the Control of Air Pollution in Idaho*). This operating permit which is effective immediately summarizes the applicable requirements for your facility and requires an annual compliance certification for all emissions units.

The enclosed operating permit is based on the information contained in your permit application, received August 13, 1997. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the *Rules for the Control of Air Pollution in Idaho*.

You are strongly encouraged to attend a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Thomas Krinke of the Boise Regional Office will contact you regarding this meeting. DEQ strongly recommends that in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, have the right to appeal this final agency action pursuant to Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, DEQ, 1410 N. Hilton, Boise, ID 38706-1255, within thirty-five (35) days of the date of this decision. Also, in accordance with IDAPA 58.01.01.366.04.a, any person may petition the Environmental Protection Agency (EPA) to object to this permit within sixty (60) days after the expiration of the EPA's forty-five

Western World, Inc. December 15, 2000 Page 2

(45) day review period. However, we encourage you to contact Marjorie MartzEmerson to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions, please contact Steve West at 373-0550 or Marjorie MartzEmerson at 373-0502.

Sincerely,

Marjorie Marzemerson
Orville D. Green

Program Administrator State Air Quality Program

ODG\MME:BR:bm

Enclosure

Copy: Boise Regional Office

DEQ State Office

Laurie Kral, EPA Region X

State of Idaho Department of Environmental Quality	PERMIT NU	0 0 0 6 4						
AIR POLLUTION OPERATING PERMIT GENERAL INFORMATION	AQCR 0 6 4 ZONE	UTM COORDINATE (km	SIC 3 7 1 5 3 7 1 8					
PERMITTEE Western World, Inc. Circle J T	milan							
2. PROJECT Tier 1 Operating Permit	1411013							
3. MAILING ADDRESS 200 N. Kit Avenue		TELEPHONE # (208) 459-0842	COUNTY Canyon					
4. CITY Caldwell		STATE Idaho	ZIP CODE 83605					
5. FACILITY CONTACT Sharon Deeds	··-	TITLE Coordinator						
6. RESPONSIBLE OFFICIAL Robert A. Bushnell, Jr.	· · · ·	TITLE President						
7. EXACT PLANT LOCATION Bordering Kit Avenue/Simplot	Blvd.							
8. GENERAL NATURE OF BUSIN Horse and Utility Trailer Mfg.	ESS & KINDS O	F PRODUCTS						
9. PERMIT AUTHORITY								
This Tier I operating permit is it of Air Pollution in Idaho, IDAPA and conditions of this permit.	ssued pursuant t . 58.01.01.300thr	to Idano Code § 39-115 and the cough 386. The Permittee sha	ne Rules for the Control Il comply with the terms					
the Department of Environmen toxic poliutants subject to S	This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Department of Environmental Quality (DEQ) for the permitted source, unless the Permittee emits toxic pollutants subject to State Only requirements pursuant to IDAPA 58.01.01.210, and the Permittee elects not to incorporate those terms and conditions into this operating permit.							
The effective date of this perm	it is the date of s	signature by DEQ on the cove	er page.					
Marjorie Martiemerson for Oruille Green		ISSUED DATE	December 15, 2000					
PROGRAM ADMINISTRATOR, STATE AIR QU		EXPIRATION DATE	December 15, 2004					
DEPARTMENT OF ENVIRONMENTAL QUAL	11							

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Western World, Inc. Tier | Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

A. FACILITY WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Record- keeping Requirements	
A.1	Fugitive Dust	Reasonable Control	IDAPA 58.01.01.650-651	A.2, A.3, A.4, A.11	
A.5	Odors	Reasonable Control	IDAPA 58.01.01.775-776	A.6, A.11	
A.7	Opacity	20% for more than three (3) minutes in any sixty (60) minute period	IDAPA 58.01.01.625	A.8, A.11	
A.16	PM	0.015 gr/dscf @ 3% Q for gas 0.050 gr/dscf @ 3% Q for liquid	IDAPA 58.01.01.677	NONE	

Fugitive Emissions

A.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

A.2 Unless specified elsewhere in this permit, the permittee shall monitor and record the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, .07, 5/1/94]

- A.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

 [IDAPA 58.01.01.322.06, .07, 5/1/94]
- A.4 Unless specified elsewhere in this permit, the permittee shall conduct a monthly facility-wide fugitive emission inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, .07, .08, 5/1/94]

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

Odors

- A.5 No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution.
 [IDAPA 58.01.01.775-776, 5/1/94 (Federally enforceable; however, this provision will become state-only
- A.6 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following:

the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date

the corrective action was taken.

enforceable upon removal from the SIP)]

[IDAPA 58.01.01.322.06,.07 (State Only), 5/1/94]

Visible Emissions

A.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

A.8 Unless specified elsewhere in this permit, the permittee shall conduct a monthly facility-wide visible emission inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emission the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than twenty percent (20%) for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, .07, .08, 5/1/94]

Excess Emissions

A.9 Unless specified elsewhere in this permit, the permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 130-136 shall govern in the event of conflicts between the subsections of A.9, and the regulations of IDAPA 130-136.

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

A.9.1 The person responsible for, or in charge of a facility during, an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

A.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with Sections 133.01(a) through (d), including, but not limited to:

[IDAPA 58.01.01.133, 4/5/00]

A.9.2.1 A prohibition of any scheduled startup; shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by the Department; and

[IDAPA 58.01.01.133.01.a, 3/20/97]

A.9.2.2 Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two (2) hours prior to the start of the excess emission event unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

A.9.2.3 The owner or operator of a source of excess emissions shall report and record the information required pursuant to Sections A.9.4 and A.9.5 of this permit and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

A.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with Sections 134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

A.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

A.9.3.1.1 The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

A.9.3.1.2 The owner or operator shall notify the Department of any upset/breakdown/safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than twenty-four (24) hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

A.9.3.1.3 The owner or operator shall report and record the information required pursuant to Sections A.9.4 and A.9.5 of this permit and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

A.9.3.2 During any period of excess emissions caused by upset, breakdown or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in Section 134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

A.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than fifteen (15) days after the beginning of each such event. Each report shall contain the information specified in Section 135.02.

[IDAPA 58.01.01.135.01, .02, .03, 3/20/97]

A.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five (5) calendar year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the information requested by Section 136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, .02, .03, 3/20/97]

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

A.9.5.1 An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA16.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

A.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/ safety preventative maintenance plans which have been developed by the owner or operator in accordance with IDAPA16.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

[IDAPA 58.01.01.130-136,4/5/00 (State Only; however, this provision will become federally enforceable upon EPA approval into the SIP), .322.08.b, 3/23/98]

Reports and Certifications

A.10 All periodic reports and certifications required by this permit shall be submitted to the Department within thirty (30) days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications and notifications shall be submitted to:

Air Quality Permit Compliance Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706-2239

The periodic compliance certification required by General Provision 21 shall also be submitted within thirty (30) days of the end of the specified reporting period to:

EPA Region 10 Air Operating Permits, OAQ-107 1200 Sixth Avenue Seattle, WA 98101

[IDAPA 58.01.01.322.08,.11, 5/1/94]

Monitoring and Recordkeeping

A.11 The permittee shall maintain sufficient record keeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

application. Supporting information includes but is not limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available to Department representatives upon request in either hard copy or electronic format.

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

A.12 The facility shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

[IDAPA 58.01.01.600-616, 5/1/94]

Renovation and Demolition

The permittee shall comply with all applicable portions of 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61 Subpart M]

A.14 This facility is subject to part 68 and shall certify compliance with all requirements of 40 CFR part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 68.215 (a) (ii)]

Test Methods

A.15 If testing is required, the Permittee shall use the following test methods to measure the pollutant emissions:

Pollutant	Test Method	Special Conditions
PM ₁₀	EPA Method 201A*	
PM	EPA Method 5*	
NO _x	EPA Method 7*	
SO₂	EPA Method 6*	
со	EPA Method 10*	
voc	EPA Method 25*	
Opacity	EPA Method 9*	If NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

Or Department-approved alternative in accordance with IDAPA 58.01.01.157

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

A. FACILITY-WIDE CONDITIONS

Fuel-Burning Equipment

A.16 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to three percent (3%) oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to three percent (3%) oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to eight percent (8%) oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to eight percent (8%) oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

Recycling and Emissions Reductions

A. 17 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82 Subpart F]

Facility-Wide VOC Emission Rate Limit

A.18 The annual facility-wide emissions of volatile organic compounds (VOCs) shall not exceed one hundred fifty tons per any consecutive twelve month period (150 T/yr).

[PTC #027-00064, 4/30/99]

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

B. BUILDING #2

B. BUILDING #2 - FIBERGLASS ROOF MANUFACTURING

The following requirements apply generally to the fiberglass roof manufacturing processes conducted in Building #2. Specifically, stack emissions from the gel coat booth and the chop booth.

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Record- keeping Requirements	
B.1	Opacity	20% for more than three (3) minutes in any sixty (60) minute period	IDAPA 58.01.01.625 Permit to Construct (PTC) #027-00064, 4/30/99	B.4, B.5, B.6 & B.7	
B.2	Facility-Wide VOCs	150 tons per any consecutive twelve month period (150 T/yr)	PTC #027-00064, 4/30/99	B.3	

B.1 No person shall discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in the IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho).

[IDAPA 58.01.01.625, 5/1/94; Permit to Construct (PTC) #027-00064, 4/30/99]

B.2 Annual facility-wide VOC emissions shall not exceed the annual VOC emission rate limit specified in section A.18 of this permit.

[PTC #027-00064, 4/30/99]

- B.3 The permittee shall calculate and record the VOC emissions from the Building #2 fiberglass processes on a monthly and annual basis using the equations below. Building #2 VOC emissions shall be added to Building #5 VOC emissions to demonstrate compliance with the annual VOC emission rate limit. The most recent five (5) years' compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request. Records shall include, but not be limited to, an explanation of the calculation methods, sample calculations, product usage rates, Material Safety Data Sheets, and product VOC concentration. Product shall include, but not be limited to, paints, primers, solvents, cleaners, resins, gel coats, and catalysts.
 - B.3.1 Monthly VOC Emission Determination Equation

$$VOC_{m} = \sum_{i=1}^{n} (X_{i} + Y_{i})$$

Where:

VOC_m = monthly VOC emission rate (lb/mo) X_i = VOC content of product i (% by weight)

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

B. BUILDING #2

Y_i = weight of product i used per month (lb/mo)

n = number of product i used

B.3.2 Annual VOC Emission Determination Equation

$$VOC_a = (\sum_{i=1}^{n} (VOC_m)_i)/2000$$

Where:

VOC_{*} = annual VOC emission rate (T/yr) (VOC_m)_i = monthly VOC emission rate for month i

number of months

[PTC #027-00064, 4/30/99]

B.4 The permittee shall develop an Operations and Maintenance (O&M) Manual for all booth filtration systems. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintained in good working order and operated as efficiency as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

B.5 The Permittee shall monitor and record the pressure drop across the filtration systems on a weekly basis. The most recent five (5) years compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

B.6 The pressure drop across the filtration systems shall be maintained within the manufacturer's and O&M Manuals specifications. Documentation of the operating pressure drop specifications for the filtration systems shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

B.7 Filters for the filtration systems for the fiberglass roof manufacturing processes in Building #2 shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

C. BUILDING #5

C. BUILDING #5 - PAINTING OPERATIONS

The following requirements apply generally to the trailer painting operations conducted in Building #5, specifically stack emissions from the prime booth, cut-in booth, top coat booth, repair booth, and heat booth.

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Record- keeping Requirements
C.1	Opacity	20% for more than three (3) minutes in any sixty (60) minute period	IDAPA 58.01.01.625 PTC #027-00064, 4/30/99	C.4, C.5, C.6 & C.7
C.2	Facility-Wide VOCs	150 tons per any consecutive twelve month period (150 T/yr)	PTC #027-00064, 4/30/99	C.3
C.8	TAPs Non- Carcinogenic Increments.	Daily product usage limit established using Eq. indicated in C.8.1	PTC #027-00064, 4/30/99 STATE ONLY REQUIREMENT	C.9, C.10
		Daily product usage limit established using Eq. indicated in C.11.1	PTC #027-00064, 4/30/99 STATE ONLY REQUIREMENT	C.9, C.12

C.1 No person shall discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho).

[IDAPA 58.01.01.625, 5/1/94; PTC #027-00064, 4/30/99]

C.2 Annual facility-wide VOC emissions shall not exceed the annual VOC emission rate limit specified in section A.18 of this permit.

[PTC #027-00064, 4/30/99]

C.3 The permittee shall calculate and record the VOC emissions from the Building #5 finishing processes on a monthly and annual basis using the equations below. Building #5 VOC emissions shall be added to Building #2 VOC emissions to demonstrate compliance with the annual VOC emission rate limit. The most recent five (5) years' compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request. Records shall include, but not be limited to, an explanation of the calculation methods, sample calculations, product usage rates, Material Safety Data Sheets, and product VOC concentration. Product shall include, but not be limited to, paints, primers, solvents, and cleaners.

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

C. BUILDING #5

C.3.1 Monthly VOC Emission Determination Equation

$$VOC_m = \sum_{i=1}^n (X_i - Y_i)$$

Where:

VOC_m = monthly VOC emission rate (lb/mo)
X_i = VOC content of product i (% by weight)
Y_i = weight of product i used per month (lb/mo)

n = number of product i used

C.3.2 <u>Annual VOC Emission Determination Equation</u>

$$VOC_{*} = (\sum_{i=1}^{n} (VOC_{m})_{i})/2000$$

Where:

VOC_a = annual VOC emission rate (T/yr) (VOC_m)_i = monthly VOC emission rate for month i

n = number of months

[PTC #027-00064, 4/30/99]

C.4 The permittee shall develop an Operations and Maintenance (O&M) Manual for all booth filtration systems. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintained in good working order and operated as efficiency as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

C.5 The Permittee shall monitor and record the pressure drop across the filtration systems on a weekly basis. The most recent five (5) years compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

0 2 7 - 0 0 0 6 4

Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

C. BUILDING #5

C.6 The pressure drop across the filtration systems shall be maintained within the manufacturer's and O&M Manuals specifications. Documentation of the operating pressure drop specifications for the filtration systems shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

C.7 Filters for the filtration systems for all painting operations in Building #5 shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99]

- C.8 The daily emission limits (pounds per day [lb/day]) for individual non-carcinogenic toxic air pollutants (TAPs) shall be determined by using the following equation:
 - C.8.1 Non-carcinogenic TAP Determination Equation

E = S/0.006

Where:

E = the total allowable daily emissions in pounds (lb/day)

S = Standard, 24-hour acceptable ambient concentration in milligrams per cubic meter

(mg/m³) from IDAPA 58.01.01.585

0.006 = factor which includes the normalized modeling results and conversion factors.

The 24-hour non-carcinogenic TAP emissions can not exceed the daily limits which shall be determined using the equation indicated in C.8.1.

[PTC #027-00064, 4/30/99; STATE ONLY]

C.9 The permittee shall use the equation indicated in C.8.1 to generate a list of daily emission rate limits for the TAPs emitted in the Building #5 finishing processes for which a standard in IDAPA 58.01.01.585 applies. Using these emission limits, the permittee shall establish a list of daily product limits (gallons per day [gal/day]) for each non-carcinogenic TAP containing products in the Building #5 finishing process (e.g. paints, primers, etc.). These limitations shall assure that the daily combined product usage will not cause an accedence of the emissions limits established using the equation indicated in C.8.1. The product usage limits must be developed prior to each day's operations. The same list may be used day after day so long as it accounts for all the non-carcinogenic TAP containing products used. The daily products usage limits list shall be made available to DEQ representatives upon request.

[PTC #027-00064, 4/30/99; STATE ONLY]

PERMIT NUMBER
0 2 7 - 0 0 0 6 4

Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

C. BUILDING #5

C.10 The permittee shall monitor and record the daily usage of each non-carcinogenic and carcinogenic, if applicable, TAP-containing product in the Building #5 finishing process to demonstrate compliance with the product usage limits established by Sections C.8 and C.11 of this permit. The daily product usage shall be recorded in records; the most recent two (2) years' compilation of which shall be kept on-site and shall be made available to DEQ representatives upon request. Records shall include an explanation of the calculation methods as well as a sample calculation.

[PTC #027-00064, 4/30/99; STATE ONLY]

C.11 Per PTC #027-00064, the daily emission limits (pounds per day [lb/day]) for individual carcinogenic TAPs shall be determined using the following equation:

C.11.1 Carcinogenic TAP Determination Equation

E = S*0.92

Where:

E = is the total allowable daily emissions in pounds (lb/day)

S = Standard, [annual] acceptable ambient concentration for carcinogens in

micrograms per cubic meter (µg/m³) from IDAPA 58.01.01.586; and

0.92 = factor which includes the normalized modeling results and conversion factors.

The carcinogenic TAP emissions can not exceed the daily limits which are determined using the equation indicated in C.11.1.

[PTC #027-00064, 4/30/99; STATE ONLY]

C.12 The permittee shall use the equation indicated in C.11.1 to generate a list of daily emission rate limits for the TAPs emitted in the Building #5 finishing processes for which a standard in IDAPA 58.01.01.586 applies. Using these emission limits, the permittee shall establish a list of daily product limits (gallons per day [gal/day]) for each carcinogenic TAP-containing product in the Building #5 finishing process (e.g. paints, primers, etc.). These limitations must assure that the daily combined product usage will not cause an accedence of the emissions limits established using the equation indicated in C.11.1. The product usage limits must be developed prior to each day's operations. The same list may be used day after day so long as it accounts for all the carcinogenic TAP containing products used.

[PTC #027-00064, 4/30/99; STATE ONLY]

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Western World, Inc. Tier I Operating Permit Caldwell, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

INSIGNIFICANT ACTIVITIES

D. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are required to be listed in the Tier I OP to qualify for a permit shield.

Location of the Emission(s) Unit at the Facility	Description	Insignificant Activities IDAPA Citation Section 3 317.01(b)(I)17 317
Building #2	Natural Gas-Fired Space Heaters; 6 Total	317.01.b.i.(18)
Building #3	Natural Gas-Fired Space Heaters; 13 Total	317.01.b.i.(18)
Building #4	Natural Gas-Fired Space Heaters; 7 Total	317.01.b.i.(18)
Building #5	Natural Gas-Fired Space Heaters; 7 Total	317.01.b.i.(18)
Building #5	Natural Gas-Fired Hot Water Heaters; 2 Total	317.01.b.i.(18)
Building #5	Natural Gas-Fired Burner (Heat Booth)	317.01.b.i.(5)
Building #4	Welding	317.01.b.i.(5)
Buildings #2, #5	Storage Tanks	317.01.a.i.(4)
Building #2	Wax Application	317.01.a.i.(27)
Buildings #2, #5	Portable Drums and Totes	317.01.a.i.(37)
Building #5	Grinding and Buffing	317.01.a.i.(49)
Building #3	Cutting Torches	317.01.a.i.(12)

D1. There are no additional monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in Part A (Facility-Wide Conditions) of this Operating Permit.

[IDAPA 58.01.01.322.06]

TIER I OPERATING PERMIT GENERAL PROVISIONS

GENERAL COMPLIANCE

1. The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a; 40 CFR § 70.6(a)(6)(I)]

 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b; 40 CFR § 70.6(a)(6)(ii)]

3. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01; 40 CFR § 70.5(b)]

REOPENING

This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c; IDAPA 58.01.01.386; 40 CFR § 70.7(f)(1) and (2); 40 CFR § 70.6(a)(6)(iii)]

5. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d; 40 CFR § 70.6(a)(6)(iii)]

PERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e; 40 CFR § 70.6(a)(6)(iv)]

INFORMATION REQUESTS

- 7. The Permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing or terminating the permit or to determine compliance with the permit.

 [Idaho Code § 39-108; IDAPA 58.01.01.122 and 322.15.f; 40 CFR § 70.6(a)(6)(v)]
- 8. Upon request, the Permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g; IDAPA 58.01.01.128; 40 CFR § 70.6(a)(6)(v)]

SEVERABILITY

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h; 40 CFR § 70.6(a)(5)]

CHANGES REQUIRING PERMIT REVISION OR NOTICE

10. The Permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under Section 213, or complying with Section 220 through 223. The Permittee shall comply with Sections 380 through 386 as applicable.

[IDAPA 58.01.01.200 through 223; IDAPA 58.01.01.322.15.l; IDAPA 58.01.01.380 through 386; 40 CFR § 70.4(b)(12), (14) and (15), and § 70.7(d) and (e), Section 213 is a State Only requirement, but has been submitted to EPA for federal approval.]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under title IV of the CAA, 42 USC Section 7651 through 7651c, or are modifications under title I of the CAA,

42 USC Section 7401 through 7515. Administrative amendments (Section 381), minor permit modifications (Section 383), and significant permit modifications (Section 382) require a revision to the Tier I operating permit. Section 502(b)(10) charges are authorized in accordance with Section 384. Off-permit changes and required notice are authorized in accordance with Section 385.

[IDAPA 58.01.01.381 through 385; IDAPA 58.01.01.209.05; 40 CFR § 70.4(b)(14) and (15)]

FEDERAL AND STATE ENFORCEABILITY

12. Unless specifically identified as a "State Only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (I) By DEQ in accordance with State law; and (ii) By the United States or any other person in accordance with Federal law.

[IDAPA 58.01.01.322.15.j; 40 CFR § 70.6(b)(1) and (2)]

Provisions specifically identified as a "State Only" provision are enforceable only in accordance with State law. "State Only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the State prior to federal approval.

[Idaho Code § 39-108; IDAPA 58.01.01.322.15.k]

INSPECTION AND ENTRY

- 14. Upon presentation of credentials, the Permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - Enter upon the Permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records
 are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor at reasonable times substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.1; 40 CFR § 70.6(c)(2)]

NEW REQUIREMENTS DURING PERMIT TERM

15. The Permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.15.m.iii; 40 CFR § 70.6(c)(3) citing § 70.5(c)(8)]

FEES

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n; 40 CFR § 70.6(a)(7)]

CERTIFICATION

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322,15.o; 40 CFR § 70.6(a)(3)(iii)(A); 40 CFR § 70.5(d)]

RENEWAL

18. a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six (6) months before but no earlier than eighteen (18) months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine (9) months prior to the date of expiration.

[IDAPA 58.01.01.313.03; 40 CFR § 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to Section 325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p; 40 CFR § 70.7(b)]

PERMIT SHIELD

- a. Compliance with the terms and conditions of the Tier I operating permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
 - Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - ii. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), Section 382.04 (significant modifications), and Section 384.03 (trading under an emissions cap).
 - c. Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §§ 39-108 and 112; IDAPA 58.01.01.122; IDAPA 58.01.01.322.15.m; IDAPA 58.01.01.325; IDAPA 58.01.01.381.04; IDAPA 58.01.01.382.04; IDAPA 58.01.01.383.05; IDAPA 58.01.01.384.03; IDAPA 58.01.01.385.03; 40 CFR § 70.6(f)]

COMPLIANCE SCHEDULE AND PROGRESS REPORTS

- 20. a. For each applicable requirement for which the source is not in compliance, the Permittee shall comply with the compliance schedule incorporated in this permit.
 - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the Permittee shall comply with such requirements in accordance with the detailed schedule.
 - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the Permittee shall meet such requirements on a timely basis.
 - For each applicable requirement with which the Permittee is in compliance, the Permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.98.10; 40 CFR 70.6(c)(3) and (4)]

PERIODIC COMPLIANCE CERTIFICATION

- 21. The Permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
 - a. Compliance certifications for all emissions units shall be submitted annually beginning twelve (12) months from the date of issuance of this permit, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ:
 - b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards and work practices;
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable);

- The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or accedence as defined under 40 CFR Part 64 occurred;
- iv. Such other facts as DEQ may require to determine the compliance status of the source.
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11; 40 CFR § 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (October 22, 1997); 40 CFR § 70.6(c)(5)(iv)]

FALSE STATEMENTS

22. No person shall knowingly make any false statement representation or certification in any form, notice or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125]

NO TAMPERING

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126]

SEMI - ANNUAL MONITORING REPORTS

24. In addition to all applicable reporting requirements identified in this permit, the Permittee shall submit reports of any required monitoring at least every six (6) months beginning six (6) months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q and 322.08.c; 40 CFR § 70.6(a)(3)(iii)]

REPORTING DEVIATIONS AND EXCESS EMISSIONS

The Permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q; IDAPA 58.01.01.135; 40 CFR § 70.6(a)(3)(iii)]

PERMIT REVISION NOT REQUIRED

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b; 40 CFR §70.6(a)(8)]

EMERGENCY

27. In accordance with IDAPA 58.01.01.332, an "Emergency" as defined at IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of Subsection 332.02 are met.

[IDAPA 58.01.01.332.01; 40 CFR § 70.6(g)]